TENNESSEE AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-1531

OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: August 5, 2009

Permit Number:
559215

Date Expires: July 1, 2014

Issued To:
Vacumet Corporation, Metallized Paper Division

Installation Address:
5705 Commerce Boulevard
Morristown

Installation Description:

32-0169-01 Faustel Paper and Film Coating Line
32-0169-04 Magnagraphics Metallized Paper Coating Line

Emission Source Reference No.: 32-0169

Renewal Application Due Date:
Between October 25, 2013 and January 23, 2014

Primary SIC: 26

Responsible Official:
Name: Keith Horvath
Title: Facility Manager

Facility Contact Person:
Name: Keith Horvath
Title: Facility Manager
Phone: (423) 585-1282

Information Relied Upon:
Application dated April 05, 2006
Administrative amendment application dated October 27, 2006
Letter dated January 20, 2009
Administrative amendment application dated July 28, 2009

(continued on the next page)

Barry R. Stephens
TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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SECTION A
GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-3-9-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

A1. **Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-3

A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-3-9-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-3-9-.02(11)(e)2(i) and 1200-3-9-.02(11)(e)1(vi)(I)

A3. **Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-3-9-.02(11)(e)1(vi)(II)

A4. **The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-3-9-.02(11)(e)1(vi)(III)

A5. **Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-3-9-.02(11)(e)1(vi)(IV)

A6. **Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-3-9-.02(11)(e)1(vi)(V)

A7. **Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-3-9.02(11)(e)1(v)

A8. **Fee payment.**

(a) The permittee shall pay an annual major source emission fee based upon the responsible official's choice of actual emissions or allowable emissions. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A major source annual emission fee will not be charged for emissions in excess of the cap (s) or for carbon monoxide.

(b) Major sources who have filed a timely, complete operating permit application in accordance with 1200-3-9-.02(11), shall pay allowable emission based fees until the beginning of the next annual accounting period following receipt of their major source operating permit. At that time, the permittee shall begin paying their annual emission fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees as stated under SECTION E of this permit. Once permitted, altering the existing choice shall be accomplished by a written request of the major source, filed in the office of the Technical Secretary at least one hundred eighty days prior to the expiration or reissuance of the major source operating permit.

(c) Major sources must conform to the following requirements with respect to fee payments:

1. If a major source choosing an allowable based annual emission fee wishes to restructure its allowable emissions for the purposes of lowering its annual emission fees, a mutually agreed upon, more restrictive regulatory requirement may be established to minimize the allowable emissions and thus the annual emission fee. The more restrictive requirement must be specified on the permit, and must include the method used to determine compliance with the limitation. The documentation procedure to be followed by the major source must also be included to insure that the limit is not exceeded. Restructuring the allowable emissions is permissible only in the annual accounting periods of eligibility and only, if the written request for restructuring is filed with the Technical Secretary at least 120 days prior to the beginning of the annual accounting period of eligibility. These periods of eligibility occur upon expiration of the initial major source operating permit, renewal of an expired major source operating permit or reissuance of a major source operating permit.

2. Beginning with the annual accounting period beginning July 1, 2004 to June 30, 2005, major sources paying on allowable based emission fees will be billed by the Division no later than April 1 prior to the end of the accounting period. The major source annual emission fee is due July 1 following the end of the accounting period.

3. Beginning with the annual accounting period beginning July 1, 2004 to June 30, 2005, major sources choosing an actual based annual emission fee shall file an actual emissions analysis with the Technical Secretary which summarizes the actual emissions of all regulated pollutants at the air contaminant sources of their facility. Based upon the actual emissions analysis, the source shall calculate the fee due and submit the payment and the analysis each July 1st following the end of the annual accounting period.

4. Beginning with the annual accounting period beginning July 1,2004 to June 30, 2005, major sources choosing a mixture of allowable and actual based emission fees shall file an actual emissions and allowable emissions analysis with the Technical Secretary which summarizes the actual and allowable emissions of all regulated pollutants at the air contaminant sources of their facility. Based upon the analysis, the source shall calculate the fee due and submit the payment and the analysis each July 1st following the end of the annual accounting period.

The mixed based fee shall be calculated utilizing the 4,000 ton cap specified in subparagraph 1200-3-26-.02(2)(i). In determining the tonnages to be applied toward the regulated pollutant 4,000 ton cap in a mixed based fee, the source shall first calculate the actual emission based fees for a regulated pollutant and apply that tonnage toward the regulated pollutant's cap. The remaining tonnage available in the 4,000 ton category of a regulated pollutant shall be subject to allowable emission based fee calculations for the sources that were not included in the actual emission based fee calculations. Once the 4,000 ton cap has been reached for a regulated pollutant, no additional fee shall be required.

5. Major sources choosing to pay their major source annual emission fee based on actual based emissions or a mixture of allowable and actual based emissions may request an extension of time to file their emissions analysis with the Technical Secretary. The extension may be granted by the Technical Secretary up to ninety (90) days. The request for extension must be postmarked no later than July 1 or the request for extension shall be denied. The request for extension to file must state the reason and give an adequate explanation.

An estimated annual emission fee payment of no less than eighty percent (80%) of the fee due July 1 must accompany the request for extension to avoid penalties and interest on the underpayment of the annual emission fee. A remaining balance due must accompany the emission analysis. If there has been an overpayment, a refund may be requested in writing to the Division or be applied as a credit toward next year's major source annual emission fee. The request for extension of time is not available to major sources choosing to pay their major source annual emission fee based on allowable emissions.

6. Newly constructed major sources or minor existing sources modifying their operations such that they become a major source in the midst of the standard July 1st to June 30th annual accounting period, shall pay allowable based annual emission fees for the fractional remainder of the annual accounting period commencing upon their start-up. At the beginning of the next annual accounting period, the "responsible official" of the source may choose to pay annual emission fees based on actual or allowable emissions or a mixture of the two as provided for in this rule 1200-3-26-.02.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-3-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant standards that can be imposed under Chapter 1200-3-11 or Chapter 1200-3-31 will place such regulated emissions in the specific hazardous air pollutant under regulation. If the pollutant is also in the family of volatile organic compounds or the family of particulates, the pollutant shall not be placed in that respective family category.

2. A miscellaneous category of hazardous air pollutants shall be used for hazardous air pollutants listed at part 1200-3-26-.02(2)(i)12 that do not have an allowable emission standard. A pollutant placed in this category shall not be subject to being placed in any other category such as volatile organic compounds or particulates.

3. Each individual hazardous air pollutant and the miscellaneous category of hazardous air pollutants is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).

4. Major sources that wish to pay annual emission fees for PM_{10} on an allowable emission basis may do so if they have a specific PM_{10} allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM_{10} emission basis, it may do so if the PM_{10} actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM_{10} emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM_{10} emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i) shall also apply to PM_{10} emissions.

TAPCR 1200-3-26-.02 (3) and (9) and 1200-3-9-.02(11)(e)1(vii)

A9. **Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-3-9-.02(11)(e)1(viii)

A10. **Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or his authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-3-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-3 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-3-9-.02(11)(e)3.(ii)

A11. **Permit shield.**

(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

1. Such applicable requirements are included and are specifically identified in the permit; or

2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

(b) Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;

2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or

4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.

(c) Permit shield is granted to the permittee.

A12. **Permit renewal and expiration.**

(a) Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted at least 180 days, but no more than 270 days prior to the expiration of this permit.

(b) Provided that the permittee submits a timely and complete application for permit renewal the source will not be considered in violation of paragraph 1200-3-9-.02(11) until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-3-9-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-3-9-.02(11)(f)3 and 2, 1200-3-9-.02(11)(d)1(i)(III), and 1200-3-9-.02(11)(a)2

A13. **Reopening for cause.**

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-3-9-.02(11)(a)2.

2. Additional requirements become applicable to an affected source under the acid rain program.

3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.

2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).

4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-3-9-.02(11)(f)6 and 7.

A14. **Permit transference.** An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

(a) Transfer of ownership permit application is filed consistent with the provisions of 1200-3-9-.03(6), and

(b) Written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-3-9-.02(11)(f)4(i)(IV) and 1200-3-9-.03(6)

A15. **Air pollution alert.** When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-3-9-.03(1) and TAPCR 1200-3-15-.03.

A16. **Construction permit required.** Except as exempted in TAPCR 1200-3-9-.04, or excluded in subparagraph TAPCR 1200-3-2-.01(1)(aa) or subparagraph TAPCR 1200-3-2-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-3-9-.01(1)(a)

A17. **Notification of changes.** The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

(a) change in air pollution control equipment

(b) change in stack height or diameter

(c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-3-9-.02(7)

A18. **Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance, the permittee must submit a schedule for coming into compliance, which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-3-9-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. **Title VI.**

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.

3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20. **112 (r).** The permittee shall comply with the requirement to submit to the Administrator or designated State Agency a risk management plan, including a registration that reflects all covered processes, by June 21, 1999, if the permittee's facility is required pursuant to 40 CFR 68 to submit such a plan.

TAPCR 1200-3-32-.03(3)

SECTION B
GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. **Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

(a) Where applicable, records of required monitoring information include the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The company or entity that performed the analysis;
4. The analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-3-9-.02(11)(e)1(iii)

B2. **Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-3-9.02(11)(e)1(iii)(II)II

B3. **Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reporting periods will be dated from the end of the first complete calendar quarter following issuance of this permit unless otherwise noted. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-3-9-.02(11)(e)1(iii)

B4. **Certification.** Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-3-9-.02(11)(d)4

B5. **Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;

(c) Whether such method(s) or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(d) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

(e) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.62, No.204, October 22, 1997, pages 54946 and 54947

B6. **Submission of compliance certification.** The compliance certification shall be submitted to:

Technical Secretary
Division of Air Pollution Control
ATTN: East Tennessee Permit Program
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

and

Air and EPCRA Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

TAPCR 1200-3-9-.02(11)(e)3(v)(IV)

B7. **Emergency provisions.** An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-3-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-3-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-3 or other applicable requirement.

TAPCR 1200-3-9-.02(11)(e)7

B8. **Excess emissions reporting.**

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-3 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-3 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry. The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-3-20-.03 and .04

B9. **Malfunctions, startups and shutdowns - reasonable measures required.** The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60 (Standards of performance for new stationary sources), 61 (National emission standards for hazardous air pollutants) and 63 (National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-3-20-.02

B10. **Sources located in non-attainment areas or having significant impact on air quality in a non-attainment area.** The owner or operator of all sources located in non-attainment areas or having a significant impact on air quality in a non-attainment area (for the pollutant designated) must submit a report to the Technical Secretary within thirty (30) days after the end of each calendar quarter listing the times at which malfunctions, startups and/or shutdowns, which resulted in emissions greater than any applicable emission limits, occurred and the estimated amount of emissions discharged during such times. This report shall also include total emissions during the quarter and be reported in a format specified by the Technical Secretary.

TAPCR 1200-3-20-.04(2)

B11. **Report required upon the issuance of a notice of violation for excess emissions.** The permittee must submit within twenty (20) days after receipt of the notice of violation, the data shown below to assist the Technical Secretary in deciding whether to excuse or validate the violation. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

(a) The identity of the stack and/or other emission point where the excess emission(s) occurred;

(b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

(c) The time and duration of the emissions;

(d) The nature and cause of such emissions;

(e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;

(f) The steps taken to limit the excess emissions during the occurrence reported, and

(g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for consideration of excusal for malfunctions.

TAPCR 1200-3-20-.06(2), (3) and (4)

SECTION C
PERMIT CHANGES

C1. **Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:

(a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-3-30.

(b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-3.

(c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.

(d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-3-9-.04.

(e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.

(f) The change shall not qualify for a permit shield under the provisions of part 1200-3-9-.02(11)(e)6.

(g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-3-9-.02(11)(a)4 (ii)

C2. **Section 502(b)(10) changes.**

(a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-3 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-3-9-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.

(b) The written notification must be signed by the facility Title V Responsible Official and include the following:

1. a brief description of the change within the permitted facility;
2. specifies the date on which the change will occur;
3. declares and quantifies where possible any change in emissions;
4. declares any permit term or condition that is no longer applicable as a result of the change; and
5. declares the requested change is not a Title I modification and will not exceed allowable emissions under the permit.

(c) The permit shield provisions of TAPCR 1200-3-9-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-3-9-.02(11)(a)4 (i)

C3. **Administrative amendment.**

(a) Administrative permit amendments to this permit shall be in accordance with 1200-3-9-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

(b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-3-9-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-3-9-.02(11)(e), TAPCR 1200-3-9-.02(11)(f) and TAPCR 1200-3-9-.02(11)(g) for significant permit modifications.

(c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-3-9-.02(11)(f)4

C4. Minor permit modifications.

(a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-3-9-.02(11)(f)5(ii).

(b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.

(c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

(d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-3-9-.02(11)(f)5(ii)

C5. Significant permit modifications.

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-3-9-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-3-9-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this source that is subject to the provisions of TAPCR 1200-3-9-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-3-9-.02(11)(f)4 or the significant modification route of TAPCR 1200-3-9-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-3-9-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-3-9-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-3-9-.02(11)(d) 1(i)(V)

SECTION D
GENERAL APPLICABLE REQUIREMENTS

D1. **Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-3-5 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-3-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-3-5 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or his representative upon his request.

TAPCR 1200-3-5-.01(1), TAPCR 1200-3-5-.03(6) and TAPCR 1200-3-5-.02(1)

D2. **General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-3-6-.03(2)

D3. **Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-3-6.

D4. **General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-3-7-.07(2)

D5. **Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-3-7.

D6. **Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-3-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

D7. **Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;

2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-3-20.

TAPCR 1200-3-8

D8. **Open burning.** The permittee shall comply with the TAPCR 1200-3-4-.04 for all open burning activities at the facility.

TAPCR 1200-3-4

D9. **Asbestos.** Where applicable, the permittee shall comply with the requirements of 1200-3-11-.02(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-3-11-.02(d) and 40 CFR, Part 61

D10. **Annual certification of compliance.** The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-3-9-.02(11)(e)1.(iii) and 1200-3-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-3-9-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

32-0169 **Source Description:** Vacumet Corporation, Metallized Paper Division is a paper and film coating operation.

Conditions E1 through E3 apply to all sources in Section E of this permit unless otherwise noted.

E1. **Fee payment: allowable emissions basis.**

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 32-0169

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	8.41	N/A	
PM_{10}	N/A	N/A	
SO_2	0.05	N/A	
VOC	245	N/A	Includes all fee emissions.
NO_X	9.5	N/A	
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	AEAR	Fee emissions are included in VOC above.
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a twelve (12) consecutive month period that **begins each July 1st and ends June 30th of the following year.** The **present Annual Accounting Period began July 1, 2009 and ends June 30, 2010.** The **next Annual Accounting Period begins July 1, 2010 and ends June 30, 2011.**

N/A **N/A** indicates that no emissions are specified for fee computation.

AEAR **AEAR** indicates that an **A**ctual **E**missions **A**nalysis is **R**equired to determine the actual emissions of:

(1) **each regulated pollutant** (Particulate matter, SO_2, VOC, NO_X and so forth. See TAPCR 1200-3-26-.02(2)(i) for the definition of a regulated pollutant.),

(2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family), and

(3) the **Miscellaneous HAP Category** under consideration during the **Annual Accounting Period.**

* **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, **the Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).**

** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-3-11 or Chapter 1200-3-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, **the Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(I).

*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO_2, VOC** or **NO_X** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-3-26-.02(2)(i).

END NOTES

The permittee shall:

(1) Pay major source annual **allowable based emission fees**, as requested by the responsible official, in accordance with the above Fee Emissions Summary Table for the current annual accounting period that began in July 1, 2009.

(2) Prepare an **actual emissions analysis** for the current annual accounting period that began July 1, **2009** in accordance with the above **Fee Emissions Summary Table.** The **actual emissions analysis** shall include:

- **(a)** the completed **Fee Emissions Summary Table**,
- **(b)** each **AEAR** required by the above **Fee Emissions Summary Table, and**
- **(c)** the records or summary of records required by Condition E3-5 of this permit. These records shall be used to complete the **AEARs** required by the above **Fee Emissions Summary Table**.

(3) Submit the **actual emissions analysis** no later than 90 days after the end of each annual accounting period.

The Tennessee Air Pollution Control Division will bill the permittee no later than April 1 prior to the end of each **annual accounting period**. The annual emission fee is due July 1 following the end of each **annual accounting period**. If any part of any fee imposed under TAPCR 1200-3-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-3-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-3-26-.02 (3) and (9), and 1200-3-9-.02(11)(e)1 (iii) and (vii)

E2. **Reporting requirements.**

a). Semiannual reports. The first report since issuance of this permit renewal shall cover the 6-month period from, September 1, 2009 to March 31, 2010, and shall be submitted within 60 days **(due date May 31, 2010)** after the 6 month period ending March 31, 2010. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. These semiannual reports shall include:

(1) Any monitoring and recordkeeping required by **Conditions E3-5, E4-1, E4-3, E4-5, E4-9, E4-10 and E5-4** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

(2) The visible emission evaluation readings from **Condition E3-2** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

(3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with Condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

b). Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

1. The identification of each term or condition of the permit that is the basis of the certification;

2. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;

3. Whether such method(s) or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this permit If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

4. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in **E2(b)(2)** above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

5. Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

The first certification since issuance of this permit renewal shall cover the 12-month period from April 1, 2009 to March 31, 2010 and shall be submitted within 60 days (due date: May 31, 2010) after the 12-month period ending March 31, 2010. Subsequent certifications shall be submitted within 60 days after the end of each 12-month period following the first certification.

These certifications shall be submitted to: **TN APCD and EPA**

The Technical Secretary
Division of Air Pollution Control
ATTN: East Tennessee Permit Program
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

and

Air and EPCRA Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303

TAPCR 1200-3-9-.02 (11)(e)3.(v)

E3. General Permit Requirements.

E3-1. Purchase orders and/or invoices or a record of purchase orders and/or invoices for all VOC and HAP containing materials along with material safety data sheets must be maintained and kept available for inspection by the Technical Secretary or his representative. These records must be retained for a period not less than five years.

E3-2. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average). TAPCR 1200-3-5-.03(6) and TAPCR 1200-3-5-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated September 12, 2005, that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E3-3. VOC/HAP/WATER & EXEMPT COMPOUND CONTENT LOG.

Determinations of the as-supplied volatile organic compounds (VOC), hazardous air pollutants (HAP) including volatile hazardous air pollutants (VHAP), water & exempt compound containing materials used in this facility shall be completed and kept on location as follows:

(a) VOC, Water & Exempt Compound Content of All Coatings, Inks, Adhesives, Thinners, Cleaners, Solvents and Ancillary Materials – to be determined by using EPA Method 24 analyses to determine volatile matter content, water and exempt compound content (volume %), density, volume solids and weight solids. Data may be obtained by laboratory analysis, from manufacturer or vendor certification that the data was determined by EPA Method 24, or from formulation data provided by the manufacturer.

(b) HAP Content of All Coatings Inks, Adhesives, Thinners, Cleaners, Solvents and Ancillary Materials – for each of these materials, the owner or operator shall determine the organic HAP weight fraction by using EPA Method 311, or the certified results from a manufacturer or vendor EPA Method 311 determination, or the results from formulation data provided by the manufacturer or vendor, or from Material Safety Data Sheets (MSDS), or from Certified Product Data Sheets (CPDS).

The results of these determinations shall be recorded in the following log. This log, the certified product data sheets and the material safety data sheets along with a record of purchase orders and invoices for all VOC and HAP containing materials shall be maintained and kept available for inspection by the Technical Secretary or his representative. These records must be retained for a period of not less than five years. If new materials are used, or if material formulation is changed, the log shall be updated within 90 days from the initial date of usage of the new or altered material.

VOC/HAP/WATER & EXEMPT COMPOUND CONTENT LOG FOR SOURCES 32-0169-01 & 32-0169-04

MATERIAL NAME	MATERIAL DENSITY (pounds MATERIAL per gallon)	WATER & EXEMPT COMPOUND % (% by volume)	VOC CONTENT (pounds VOC per gallon)	HAP_1 CONTENT (pounds HAP_1 per gallon)	HAP_p CONTENT (pounds HAP_p per gallon)	TOTAL HAP CONTENT (pounds HAP_1 thru HAP_p per gallon)
$Material_1$						
$Material_2$						
$Material_i$						

Note: i = 1, 2, 3…n = the number of different materials, and p = 1, 2, 3…m = the number of different hazardous air pollutants. Use rows as required for the number of different materials and columns as required for the number of different hazardous air pollutants.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

E3-4. This facility is subject to the requirements found in "National Emission Standards for Hazardous Air Pollutants for Paper and other Web Coating" (40 CFR Part 63 Subpart JJJJ). This facility shall not emit more than 10 tons per 12 consecutive months of any single hazardous air pollutant, or 25 tons per 12 consecutive months of any combination of hazardous air pollutants. Compliance with this condition shall insure that the facility meets the definition of an area source under the MACT Rule for Paper and other Web Coating".

40 CFR 63 Subpart JJJJ.

Compliance Method: Compliance with this limitation shall be assured by the recordkeeping requirement in Condition E3-5.

E3-5. Emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed 9.9 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24.9 tons during all intervals of 12 consecutive months. In the event that these limits are exceeded, this facility shall comply with all requirements found in 40 CFR 63 Subpart JJJJ- MACT Rule for Paper and other Web Coating.

40 CFR 63 Subpart JJJJ

Compliance Method: The permittee shall keep records in the following format to show compliance with the above limit.

Single HAP log

HAP Name	From Source 01 (Log 1 or Log 2)	From Source 04 Log 3	From Clean up Solvents	Month---------- Each HAP (tons per month)	Each HAP for 12 consecutive months
Toluene					
Formaldehyde					
Glycol ethers, etc.					

Combined HAP Log

Month	Combined HAP emissions for source 01 (from log 1 or log 2)	Combined HAP emissions for source 04 (from log 2)	HAPs from Clean-up solvents	Total HAP emissions from the facility per month (01 +04 + cleanup)	Total HAP emissions for 12 consecutive months

E3-6. Regarding recordkeeping of logs, the following is applicable:

(a) For sources required to maintain monthly logs:
All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required.

(b) For sources required to maintain weekly logs:
All data, including all required calculations, must be entered in the log no later than seven (7) days from the end of the week for which the data is required.

(c) For sources required to maintain daily logs:
All data, including all required calculations, must be entered into the log no later than seven (7) days from the end of the day for which the data is required.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

32-0169-01	**Source Description:**	**Faustel Paper and Film Coating Line:** This source includes the Faustel paper and film coating line with heat exchangers, drying ovens and regenerative thermal oxidizer (RTO). The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions are captured within a permanent enclosure. The collected VOC and HAP emissions are controlled by the RTO. The RTO exhausts out of a stack (S05) that is 35 feet above grade with the inside dimension of 4.3 feet. This source has two by-pass stacks (S06 & S07) located at the ovens.

Conditions E4-1 through E4-11 apply to source 32-0169-01.

E4-1. Volatile organic compounds emitted from this source (32-0169-01) shall not exceed 70 tons during all intervals of 12 consecutive months.

TAPCR 1200-3-7-.07(2)

Compliance Method: A log of information in the following format must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log shall be used in the reports required by **Condition E2** of this permit. This log must be retained for a period of not less than five years.

YEARLY VOC/HAP EMISSIONS LOG

MONTH/ YEAR	**VOC EMISSIONS (tons VOC per month) From Log 1 and Log 2	*VOC EMISSIONS (tons VOC per 12 months)	**TOTAL HAP EMISSIONS (tons per month) From Log 1 and Log 2	Total HAP Emissions per (tons per 12 consecutive months)

E4-2. This source is subject to Rule 1200-3-18-.14 Paper and Related Coating; and will comply with the requirements of this rule by the use of one of the following **alternative operating scenarios (AOS):**
(a) AOS #1: The use of monthly-weighted averaging (i.e., coatings with a VOC content not in excess of 2.9 pounds per gallon of coating, excluding water and/or exempt compounds, as applied, on a monthly weighted average basis), and/or
(b) AOS #2: The use of a capture system and a control device (regenerative thermal oxidizer) with a minimum overall emission reduction efficiency of 95 percent.

TAPCR 1200-3-18-.14(3)

E4-3. This source shall record in a log at the permitted facility the scenario under which it is operating, as described below:
A log of information in the following format must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than five years.

ALTERNATIVE OPERATING SCENARIO LOG FOR SOURCE 32-0169-01

DATE	TIME	SWITCHED TO AOS #1: Use of monthly weighted averaging.	SWITCHED TO AOS #2: Use of capture system and control device.
(date 1)	(time 1)	√	
(date 2)	(time 2)		√
etc.			

E4-4. Particulate emissions from this source shall not exceed 0.005 grains per dry standard cubic foot (1.35 pounds per day).

TAPCR 1200-3-7-.01(5) and 1200-3-26-.02(9). Agreement letter dated May 19, 2009

Compliance Method: The compliance with this limit is based on EPA AP-42 emission factors (Table 1.4-2) for natural gas combustion. (7.6 pound per million cu.ft of natural gas)

Alternative Operating Scenario #1: Use of monthly weighted averaging.

E4-5. This source (32-0169-01) shall not apply coatings whose weighted average VOC content exceeds 2.9 pounds per gallon of coating, excluding water and/or exempt compounds, as applied, on a monthly weighted average basis.

TAPCR 1200-3-18-.14(3)(a)

Compliance Method: See **Condition E4-6.**

E4-6. A log of information in the following format must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log shall be used in the reports required by **Condition E2** of this permit. This log must be retained for a period of not less than five years.

LOG 1 MONTH AND YEAR----------

MATERIAL NAME	USAGE (gallons per month)	VOC CONTENT (pounds VOC per gallon) From condition E3-3	VOC EMISSIONS (tons VOC per month)	HAP_1 CONTENT (pounds HAP_1 per gallon)	HAP_1 EMISSIONS (tons HAP_1 per month)	HAP_p CONTENT (pounds HAP_p per gallon)	HAP_p EMISSIONS (tons HAP_p per month)	TOTAL HAP EMISSIONS (tons HAP_1 thru HAP_p per month)
$Coating_1$								
$Coating_2$								
$Coating_3$								
$Coating_i$								
$Thinner/Solvent_1$								
$Thinner/Solvent_2$								
$Thinner/Solvent_3$								
$Thinner/Solvent_q$								
TOTALS:	X		Y		HAP1		HAPp	

Where: i = 1, 2, 3... n = the number of different coatings/materials;
p = 1, 2, 3... m = the number of different hazardous air pollutants; and
q = 1, 2, 3... r = the number of different thinners/solvents added to coatings;
Use rows as required for the number of different materials and columns as required for the number of different hazardous air pollutants.

EQUATIONS FOR THE MONTHLY VOC/HAP EMISSIONS LOG 1 CALCULATIONS:

1. Coating VOC Emisions (tons VOC per month)

$$= \frac{(Coating_i \text{ Usage (gallons per month)})\ (Coating_i \text{ VOC Content (lb. VOC per gallon)})}{(2000 \text{ lb/ton})}$$

2. HAP_p Emisions (tons HAP_p per month)

$$= (Coating_i \text{ Usage (gallons per month)})\ (Coating_i\ HAP_p \text{ Content (lb. } HAP_p \text{ per gallon)})$$

(2000 lb/ton)

3. Thinner/Solvent$_q$ VOC Emisions (tons VOC per month)

$$= \frac{\text{(Thinner/Solvent}_q\text{ Usage (gallons per month)) (Thinner/Solvent}_q\text{ VOC Content (lb. VOC per gallon))}}{\text{(2000 lb/ton)}}$$

4. Thinner/Solvent$_q$ HAP$_p$ Emisions (tons HAP$_p$ per month)

$$= \frac{\text{(Thinner/Solvent}_q\text{ Usage (gallons per month)) (Thinner/Solvent}_q\text{ HAP}_p\text{ Content (lb. HAP}_p\text{ per gallon))}}{\text{(2000 lb/ton)}}$$

5. Monthly-weighted average VOC Content Of all Coatings, As Applied (Pounds VOC Per Gallon, excluding water and exempt compounds)

=**Y/X** = [(Monthly VOC emissions (pounds/month)] / [Monthly Material Usage(gallons per month)]

Alternative Operating Scenario #2: Use of capture system and control device.

E4-7. This source (32-0169-01) shall install and operate a capture system (permanent total enclosure) and a control device (regenerative thermal oxidizer (thermal incinerator)) with a minimum overall emission reduction efficiency of 95 percent.

TAPCR 1200-3-18-.14(5)

Compliance Method: See condition E4-8.

E4-8. When the source relies on the use of a permanent enclosure and thermal incinerator for compliance, the permanent enclosure shall meet the following criteria for total enclosure:

(a) Any natural draft opening (NDO, as defined under Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure in Appendix B to 40 CFR §52.741) shall be at least four equivalent opening diameters from each VOC emitting point.
(b) The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
(c) The average facial velocity (FV) of airflow through all NDOs shall be at least 200 feet per minute (fpm). The direction of airflow through all NDOs shall be into the enclosure.
(d) All access doors and windows whose areas are not included in (b) above and are not included in the calculation in (c) above shall be closed during routine operation of the process.
(e) All VOC emissions must be captured and contained for discharge through a control device.

Compliance Method: Compliance with this condition has been demonstrated by an EPA Method 204 test performed on February 2, 2006, at the facility.

E4-9. Pursuant to the requirements of the Compliance Assurance Monitoring (CAM) Rule (40 CFR 64), the permittee shall install, calibrate, certify to the Technical Secretary, operate, and maintain continuous monitoring equipment on the Regenerative Thermal Oxidizer (RTO) which shall monitor the combustion chamber temperature at all times when this coating line is in operation. The monitoring equipment shall meet the following requirements:

1. The continuous temperature monitoring equipment shall be equipped with a continuous recorder and have an accuracy of ±1 percent of the combustion temperature being measured expressed in degrees Celsius, or 0.5°C, whichever is greater.
2. The continuous recorder may be any device, which records the combustion temperature at least four times per hour, at equally spaced intervals.
3. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

Any 3-hour block of time, during which the average combustion zone temperature in the RTO is more than 28°C (50°F) below the average combustion temperature (1686°F) during the most recent emission test (February 2, 2006) which demonstrated that the source was in compliance, shall be considered an excursion.

Reports shall include a sample (one page) from the reporting period that shows the 3–hour block average temperatures. Also, the minimum 3-hour block average temperature value during the reporting period and the date and time period it occurred.

E4-10. A log of information in the following format must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log shall be used in the emissions analysis required by **Condition E1** of this permit and in the reports required by **Condition E2** of this permit.. This log must be retained for a period of not less than five years.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

LOG 2 MONTH/YEAR

MATERIAL NAME	USAGE (gallons per month)	VOC CONTENT (lbs VOC per gallon)	Control efficiency 96.9%	VOC EMISSIONS (lbs VOC per month)	HAP_1 CONTENT (lbs HAP_1 per pound of VOC	HAP_1 EMISSIONS (lbs HAP_1 per month)	HAP_p CONTENT (lbs HAP_p per pound of VOC)	HAP_p EMISSIONS (lbs HAP_p per month)	TOTAL HAP EMISSIONS (tons HAP_1 thru HAP_p per month)
TOTAL									

Note: p = 1, 2, 3,..... n = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.

EQUATIONS FOR THE MONTHLY VOC/HAP EMISSIONS LOG 2 CALCULATIONS:

1. Controlled VOC Emissions (tons VOC per month)

   = (1- OERE) [Material usage (gallons per month). (VOC Content (lb. VOC per gallon))]

   Where: OERE = overall emissions reduction efficiency

2. HAPp Emissions (tons HAPp per month)

   = (VOC emissions) (% HAP content)

3. Total HAP Emissions (tons HAP per month)

   = Σ [$HAP_{1..p}$ emissions (tons HAP per month)]

E4-11: For fee purposes, the products of combustion emitted from this source are:

SO2 = 0.05 tpy
CO = 7.0 tpy
NOx = 9.50 tpy

32-0169-04	**Source Description:**	**Magnagraphics Metallized Paper Coating Line:** This source includes the Magnagraphics metallized paper coating line with drying oven and flame treater. The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions are exhausted out of the drying oven stack (S02) that is 32.6 feet above grade with the inside dimension of 2 feet. The flame treater is considered an insignificant activity.

Conditions E5-1 through E5-4 apply to source 32-0169-04.

E5-1 Volatile organic compounds emitted from this source (32-0169-04) shall not exceed 16 tons per month and 175 tons during all intervals of 12 consecutive months.

TAPCR 1200-3-7-.01(5) to avoid PSD

Compliance Method: Recordkeeping as required by condition E5-4.

E5-2 VOC content shall not exceed 2.9 pounds per gallon of coating, excluding water and/or exempt compounds, as applied, on a monthly weighted average basis).

TAPCR 1200-3-18-.14(3)(b)

Compliance Method: Recordkeeping as required by condition E5-4.

E5-3. Particulate emissions from this source shall not exceed 0.005 grains per dry standard cubic foot (0.57 pounds per day).

TAPCR 1200-3-7-.01(5) and 1200-3-26-.02(9). Agreement letter dated May 19, 2009

Compliance Method: The potential to emit particulate emissions from this source is less than five tons per year. In accordance with TAPCD 1200-3-9-.04(5)(c)3. and by annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-3-9-.02(11)(e)1.(iii), and the compliance requirements of TAPCR 1200-3-9-.02(11)(e)3.(i).

E5-4. Recordkeeping of VOC emissions and HAP emissions for compliance and fee purposes shall include the following logs. Logs of information in the following format must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must be retained for a period of not less than five years.

TAPCR 1200-3-9-.02(11)(e)1.(iii)

Log 3 Month/year----------

MATERIAL NAME	USAGE (gallons per month)	VOC CONTENT (pounds VOC per gallon) From E3-3	VOC EMISSIONS (tons VOC per month)	HAP_1 CONTENT (pounds HAP_1 per gallon) From E3-3	HAP_1 EMISSIONS (tons HAP_1 per month)	HAP_p CONTENT (pounds HAP_p per gallon) From E3-3	HAP_p EMISSIONS (tons HAP_p per month)	TOTAL HAP EMISSIONS (tons HAP_1 thru HAP_p per month)
$Coating_1$								
$Coating_2$								
$Coating_3$								
$Coating_i$								
$Thinner/Solvent_3$								
$Thinner/Solvent_q$								
TOTALS	X		Y					

Where: i = 1, 2, 3... n = the number of different coatings/materials;
p = 1, 2, 3... m = the number of different hazardous air pollutants; and
q = 1, 2, 3... r = the number of different thinners/solvents added to coatings;
Use rows as required for the number of different materials and columns as required for the number of different hazardous air pollutants.

EQUATIONS FOR THE VOC/HAP EMISSIONS LOG 3 CALCULATIONS:

1. Coating VOC Emisions (tons VOC per month)

$$= \frac{(\text{Coating}_i \text{ Usage (gallons per month)}) (\text{Coating}_i \text{ VOC Content (lb. VOC per gallon)})}{(2000 \text{ lb/ton})}$$

2. HAP_p Emisions (tons HAP_p per month)

$$= \frac{(\text{Coating}_i \text{ Usage (gallons per month)}) (\text{Coating}_i \text{ } HAP_p \text{ Content (lb. } HAP_p \text{ per gallon)})}{(2000 \text{ lb/ton})}$$

3. Thinner/Solvent_q VOC Emisions (tons VOC per month)

$$= \frac{(\text{Thinner/Solvent}_q \text{ Usage (gallons per month)}) (\text{Thinner/Solvent}_q \text{ VOC Content (lb. VOC per gallon)})}{(2000 \text{ lb/ton})}$$

4. Thinner/Solvent_q HAP_p Emisions (tons HAP_p per month)

$$= \frac{(\text{Thinner/Solvent}_q \text{ Usage (gallons per month)}) (\text{Thinner/Solvent}_q \text{ } HAP_p \text{ Content (lb. } HAP_p \text{ per gallon)})}{(2000 \text{ lb/ton})}$$

5. Monthly-weighted average VOC Content Of all Coatings, As Applied (Pounds VOC Per Gallon, excluding water and exempt compounds)

=Y/X = [(Monthly VOC emissions (pounds/month)] / [Monthly Material Usage(gallons per month)]

Log 4 YEARLY VOC/HAP EMISSIONS LOG FOR SOURCE 32-0169-04

MONTH/YEAR	VOC EMISSIONS (tons VOC per month)	(*)VOC EMISSIONS (tons VOC per 12 months)	(**)TOTAL HAP EMISSIONS (tons HAP_1 thru HAP_p per month)

(*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.

END OF PERMIT NUMBER: 559215

ATTACHMENT 1

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION EVALUATION METHOD 9 dated JUNE 18, 1996 amended on September 12, 2005

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-3-9-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards in paragraph 1200-3-5-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO_2, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

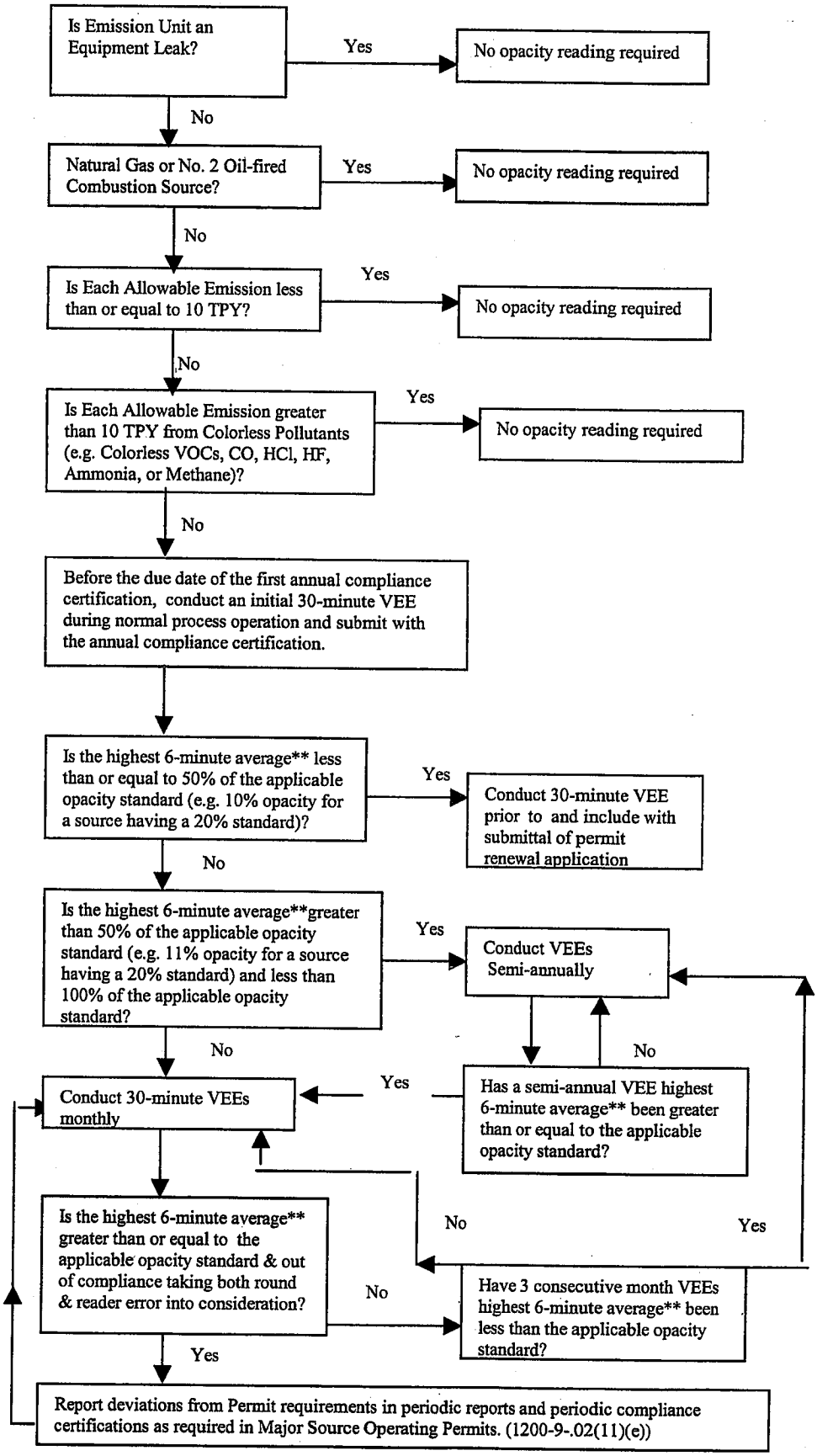
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declares non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 12, 2005



ATTACHMENT 2

Compliance Assurance Monitoring Plan

Compliance Assurance Monitoring Plan

Vacumet Corp.
Morristown, TN

2006

(included as an adjunct of the Title V Application for Renewal of Permit)

This Plan has been created to support compliance with 40 CFR 64.1 through 64.10. Outlined below are the methods and means that will be used to insure that information created as part of the day-to-day operations of the Vacumet facility located at 5705 Commerce Boulevard, Morristown, TN is being operated within the requirements of the air pollution permit assigned to the site.

General Indicators for Faustel Coater:

The following are determined to be general monitoring indicators of the emissions from the Faustel Coater:

Fugitive Volatile Organic Compounds Quantities
Particulate Matter (and variations TSP, PM_{10}, and $PM_{2.5}$)
Sulfur Dioxide
Oxides of Nitrogen
Carbon Dioxide
Volatile Organic Compound Quantities Used in Coating (before control and after control)
Adequacy of 100% Permanent Total Enclosure

Measurement of General Indicators for Faustel Coater:

In the following table, measure of the general indicators is outlined. Included is the method used to collect data (i.e. computer system, temperature controller, pressure measurement device) along with the frequency of the measurement

Location of Potential Source	Permit Required Control, Monitoring Indicator, or Evaluation Point	Means and Methods of Data Collection and Compliance Assurance	Quality Control on Compliance Assurance
	Fugitive and Stack Volatile Organic	Data is collected from computer system that charts the use of each chemical. The data will be collected	The amounts charged for use will be monitored by Mix Room staff to insure that the amounts are

Location of Potential Source	Permit Required Control, Monitoring Indicator, or Evaluation Point	Means and Methods of Data Collection and Compliance Assurance	Quality Control on Compliance Assurance
	Hydrocarbons	once each six months. Use data will then be evaluated using calculations (spreadsheets) to determine the specific chemicals present in the materials issued/used. The VOC components in used materials will then be summed and reported in semi-annual reports for the site as required under the current permit. For annual emissions reporting, the amount of VOC will be summed for all sources at the site and reported.	judged consistent with use patterns. The VOC content of each used material will be evaluated using the most current MSDS listing contents of the material. Where ranges or > or < amounts are given, rules used for EPCRA reporting will be used. Data will be entered into a computerized spreadsheet and data will be evaluated to insure that resulting calculations are reasonable. Comparisons to permit limitations will be conducted by senior staff to insure that appropriate judgments are made.
	NAAQS – PM (TSP)	Data will be collected from natural gas usage to determine the scfm of gas used during the calendar year. The amount of PM (TSP) used will be then calculated from the scfm of gas multiplied by the current AP-42 factor. For annual emissions reporting, the amount of PM (TSP) will be summed for all sources at the site and reported.	Billings will be reviewed to insure that amounts of natural gas used are consistent with internal expectations.
	NAAQS – PM_{10}	Data will be collected from natural gas usage to determine the scfm of gas used during the calendar year. The amount of PM_{10} used will be then calculated from the scfm of gas multiplied by the current AP-42 factor. For annual emissions reporting, the amount of PM_{10} will be summed for all sources at the site and reported.	Billings will be reviewed to insure that amounts of natural gas used are consistent with internal expectations.
	NAAQS – $PM_{2.5}$	Data will be collected from natural gas usage to determine the scfm of gas used during the calendar year. The amount of $PM_{2.5}$ used will be then calculated from the scfm of gas multiplied by the current AP-42 factor. For annual emissions reporting, the amount of $PM_{2.5}$ will be summed for all sources at the site and reported.	Billings will be reviewed to insure that amounts of natural gas used are consistent with internal expectations.
	NAAQS – SO_2	Data will be collected from natural gas usage to determine the scfm of gas used during the calendar	Billings will be reviewed to insure that amounts of natural gas used are consistent with internal

Location of Potential Source	Permit Required Control, Monitoring Indicator, or Evaluation Point	Means and Methods of Data Collection and Compliance Assurance	Quality Control on Compliance Assurance
		year. The amount of SO_2 used will be then calculated from the scfm of gas multiplied by the current AP-42 factor. For annual emissions reporting, the amount of SO_2 will be summed for all sources at the site and reported.	expectations.
	NAAQS – NO_x	Data will be collected from natural gas usage to determine the scfm of gas used during the calendar year. The amount of NO_x used will be then calculated from the scfm of gas multiplied by the current AP-42 factor. For annual emissions reporting, the amount of NO_x will be summed for all sources at the site and reported.	Billings will be reviewed to insure that amounts of natural gas used are consistent with internal expectations.
	NAAQS – CO	Data will be collected from natural gas usage to determine the scfm of gas used during the calendar year. The amount of CO used will be then calculated from the scfm of gas multiplied by the current AP-42 factor. For annual emissions reporting, the amount of CO will be summed for all sources at the site and reported.	Billings will be reviewed to insure that amounts of natural gas used are consistent with internal expectations.
	95% VOC Reduction	Several items will be measured to insure compliance: ▪ Data is collected from computer system that charts the use of each chemical. The data will be collected once each six months. Use data will then be evaluated using calculations (spreadsheets) to determine the specific chemicals present in the materials issued/used. The VOC components in used materials will then be summed and reported in semi-annual reports for the site as required under the current permit.	▪ The amounts charged for use will be monitored by Mix Room staff to insure that the amounts are judged consistent with use patterns. The VOC content of each used material will be evaluated using the most current MSDS listing contents of the material. Where ranges or > or < amounts are given, rules used for EPCRA reporting will be used. Data will be entered into a computerized spreadsheet and data will be evaluated to insure that resulting calculations are reasonable. Comparisons to permit limitations will be conducted by senior staff to insure that appropriate judgments are made.

Location of Potential Source	Permit Required Control, Monitoring Indicator, or Evaluation Point	Means and Methods of Data Collection and Compliance Assurance	Quality Control on Compliance Assurance
		▪ Central Chamber Temperature – the central chamber temperature for the thermal oxidizers attaches to this coater will be recorded during all VOC coating operations. The temperatures will be no less than -50°F below the temperature used during the last stack test. The temperature will be set by the Maintenance staff during each startup and verified.	▪ The temperature measurement system is on the preventative maintenance system and will be verified at least once annually against appropriate standards. The strip chart recorder recording the central chamber temperature will measure the temperature and record on a continuous basis. A backup data logger is also present and records temperature data for download one each two weeks.
		▪ If the central chamber temperature falls below the set point by > 50°F, the alarm system will sound. (The set point is currently 1600°F so the alarm will sound at 1550°F.)	▪ The alarm system will be verified at least once annually. No problems are present by going to a higher temperature from a destruction perspective but damage to the thermal oxidizer may result if the central chamber temperature routinely exceeds 1800°F.
		▪ Per Tennessee regulations, a stack test will be conducted once every five years (permit renewal cycle) using EPA approved methods to verify actual destruction efficiency.	▪ The stack testing firm will be a recognized third party competent in testing the types and kinds of systems employed by Vacumet for VOC removal.
	95% VOC Reduction with 100% Capture	Several items will be measured to insure compliance: ▪ Once per shift during operations, the staff will record the pressure drop between the coating room area and the permanent total enclosure (PTE). The result should be greater than 0.007" H_2O to insure that 200 fpm of air velocity is moving into the enclosure. The findings will be recorded. There is no "upper limit" that would adversely impact operations for the PTE.	▪ The pressure gauge (magnahelic is one option) used for this pressure drop measurement are on the preventative maintenance system and will be verified at least once annually against appropriate standards. The findings of the pressure drop measurement will be recorded at least once each 24 hours by staff present during coater operations (no data will be recorded in the coater is down or otherwise not operational).
		▪ Per Tennessee regulations, a PTE test will be conducted once every four years using EPA	▪ The stack testing firm will be a recognized third party competent in testing the types and kinds of

Location of Potential Source	Permit Required Control, Monitoring Indicator, or Evaluation Point	Means and Methods of Data Collection and Compliance Assurance	Quality Control on Compliance Assurance
		approved methods (Method 204) to verify actual destruction efficiency.	systems employed by Vacumet for VOC removal.

Actions Required:

This plan is implemented by the entire staff of the Vacumet facility in Morristown, TN. Specific assignments of responsibility will be made by the Plant Manager.

Modification of Equipment:

When the Faustel Coater's fuel sources (natural gas and propane equivalent natural gas), thermal oxidizer, or coating head enclosures are modified, each will be evaluated to insure that no significant change has occurred. If a significant change has occurred, this plan will be modified to include the changes necessary to maintain appropriate measurement systems to insure the Faustel Coater is meeting all measurement requirements. (See Review Section for when mandatory yearly "change evaluation" will be conducted).

Special Criteria:

At this time, no special criteria are thought needed to insure continuous assurance of the operating systems for the Faustel Coated used to minimize emissions.

Response to Excursions and Exceedences:

For each of the listed excursions, the following response will be considered:

- Change in Fuels

Any change in fuels from the current natural gas or propane would be considered an excursion and require review to insure that emissions are within acceptable limited. This will be conducted before any change in fuels is considered.

- Temperature in Central Chamber of Thermal Oxidizer Drops Below 1550°F (current lower range limit)

At this point, the alarm should sound indicating the low temperature for this device has been reached. The operations staff for the Faustel Coater will immediately respond to the alarm. This staff and Maintenance Staff called to the Coater will initially evaluate the situation. If the Faustel Coater's thermal oxidizer cannot be brought back up to temperature (1550°F) within 60 minutes, a malfunction report will be made and the Faustel

Coater will be brought immediately to a "soft landing." If the coater operates more than one hour at or below the required temperature (1550°F), a deviation will be reported to TDEC.

The Faustel Coater will not be put back "on line" with solvent based coating exceeding 2.9 lbs of VOC per gallon of coating until the thermal oxidizer is returned to operating condition and is at or above baseline operating temperature of 1550°F for routine operations.

- 100% PTE Pressure Drops Below 0.007 inches of Water

The 100% PTE's will be kept at a pressure differential of 0.007 inches of water or greater at all times when operating with coatings containing 2.9 lbs of VOC per gallon of coating. If the pressure differential drops below 0.007 inches of water, the Operations Staff and Maintenance Staff called to the Coater will initially evaluate the situation. If the Faustel Coater's 100% PTE's cannot be brought back up to a pressure differential of greater than 0.007 inches of water within 60 minutes, a malfunction report will be made and the Faustel Coater will be brought immediately to a "soft landing." If the coater operates more than one hour at or below the required pressure drop of 0.007 inches of water, a deviation will be reported to TDEC.

The Faustel Coater will not be put back "on line" with solvent based coating exceeding 2.9 lbs of VOC per gallon of coating until the pressure drop is greater than 0.007 inches of water for routine operations.

Review:

This plan will be reviewed once per year as part the emergency preparedness review by the facility staff. Any changes will be made in the plan:

- at that time (typically November of each year), and/or
- when regulations change, and/or
- failures in the compliance monitoring plan require additional review and modification.

MALFUNCTION, STARTUPS, AND SHUTDOWNS EXCESSIVE EMISSIONS LOG
VACUMET CORP.
MORRISTOWN, TN

Under air permit #548489, we are required to note when excessive emissions occur from malfunction, startups and shutdowns that do not follow routine procedures and operations. When such an even occurs, please complete the following information on the log below.

Stack or Emission Point Where Excess Emission Occurred	Date and Time of Malfunction	Type of Malfunction (describe)	Actions Taken to Return to Compliance with Air Permit Requirements	Date and Time Returned to Compliance	Signature of Person Overseeing this Activity

VERIFICATION OF 100% PTE AT COATING HEADS OF FAUSTEL COATER
VACUMET CORP., MORRISTOWN, TN

Standard that must be achieved is a ΔP: Greater than 0.007 in H_2O

Please record the ΔP for each of the two permanent total enclosures around the coating heads at the Faustel Coater.

Take the measurement at 12:00 Noon for day shift and 12:00 Midnight for night shift.

If the Faustel Coater is not operating at the designated time, conduct testing when the Faustel Coater next becomes fully operational producing product or otherwise the most reasonable practical time right after the recommended time.

Month	Day	Time	Coating Head #1 Reading	Coating Head # 2 Reading	Initials of Person Making Measurements
	1	12:00 Noon			
		12:00 Midnight			
	2	12:00 Noon			
		12:00 Midnight			
	3	12:00 Noon			
		12:00 Midnight			
	4	12:00 Noon			
		12:00 Midnight			
	5	12:00 Noon			
		12:00 Midnight			
	6	12:00 Noon			
		12:00 Midnight			
	7	12:00 Noon			
		12:00 Midnight			
	8	12:00 Noon			
		12:00 Midnight			
	9	12:00 Noon			
		12:00 Midnight			
	10	12:00 Noon			
		12:00 Midnight			
	11	12:00 Noon			
		12:00 Midnight			
	12	12:00 Noon			
		12:00 Midnight			
	13	12:00 Noon			
		12:00 Midnight			
	14	12:00 Noon			

Month	Day	Time	Coating Head #1 Reading	Coating Head # 2 Reading	Initials of Person Making Measurements
		12:00 Midnight			
	15	12:00 Noon			
		12:00 Midnight			
	16	12:00 Noon			
		12:00 Midnight			
	17	12:00 Noon			
		12:00 Midnight			
	18	12:00 Noon			
		12:00 Midnight			
	19	12:00 Noon			
		12:00 Midnight			
	20	12:00 Noon			
		12:00 Midnight			
	21	12:00 Noon			
		12:00 Midnight			
	22	12:00 Noon			
		12:00 Midnight			
	23	12:00 Noon			
		12:00 Midnight			
	24	12:00 Noon			
		12:00 Midnight			
	25	12:00 Noon			
		12:00 Midnight			
	26	12:00 Noon			
		12:00 Midnight			
	27	12:00 Noon			
		12:00 Midnight			
	28	12:00 Noon			
		12:00 Midnight			
	29	12:00 Noon			
		12:00 Midnight			
	30	12:00 Noon			
		12:00 Midnight			
	31	12:00 Noon			
		12:00 Midnight			

When the month is done, please give the completed form to Scott Palmer for recordkeeping purposes.

TITLE V PERMIT STATEMENT

Facility Name:	**Vacumet Corporation, Metallized Paper Division**
City:	**Morristown**
County:	**Hamblen**

Date Application Received:	**April 05, 2006**
Date Application Deemed Complete:	**May 30, 2006**

Emission Source Reference No.:	**32-0169**
Permit No.:	**559215**

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-3-9-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to ***Vacumet Corporation, Metallized Paper Division,*** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD	Prevention of Significant Deterioration
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
MACT	Maximum Achievable Control Technology
NSR	New Source Review

I. Identification Information

A. Source Description List and describe emission source(s):
32-0169-01 Faustel Paper and Film Coating Line
32-0169-04 Magnagraphics Metallized Paper Coating Line

B. Facility Classification

1. **Attainment or Non-Attainment Area Location** Area ***is*** designated as an attainment area for all criteria pollutants.

2. Company ***is*** located in a ***Class II area.***

C. Regulatory Status

1. **PSD/NSR.** This facility ***is not*** a major source under PSD.

2. **Title V Major Source Status by Pollutant**

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	YES		X
PM_{10}	YES		X
SO_2	YES		X
VOC	YES	X	
NO_X	YES		X
CO	YES		X
Individual HAP	YES		X
Total HAPs	YES		X

3. **MACT Standards** This facility ***is not*** a major source for HAPs. The facility is an area source for: National Emission Standards for Hazardous Air Pollutants; Paper and other Web Coating, 40 CFR Part 63 Subpart JJJJ.

4. **Program Applicability** Are the following programs applicable to the facility?

PSD *(no)*
NESHAP *(no)*.
NSPS *(no)*

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? *(yes)*

Are there any applicable requirements that will become effective during the permit term? *(NO)*

III. Other Requirements

A. Emissions Trading

The facility is ***not*** involved in an emission trading program.

B. Acid Rain Requirements

This facility is ***not*** subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Applicable

IV. Public Participation Procedures

Notification of this draft permit was mailed to the following environmental agencies:

1. United States Environmental Protection Agency.
2. Kentucky Dept. for Environmental Protection.
3. NC Dept. of Environment and Natural Resources.
4. Virginia Department of Environmental Quality.
5. Knox County Dept. of Air Quality Management
6. The Eastern Band of Cherokee Indians

V. Permit Changes:

Minor Modification

The permit was modified to add a "floor Sweep" ventilation. The system takes solvent laden air from the 100% PTE around the oven and then joins the ductwork to the thermal oxidizer. A bypass stack is being added to the new ductwork.

Administrative Amendments:
Change in the name of Responsible Official.

Knox

AUG 10 2009

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of air pollution control
9th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1531

August 5, 2009

Certified Mail 7007 1490 0001 0737 9366
Return Receipt Requested

Mr. Todd Berger
Plant Manager
Vacumet Corporation, Metallized Paper Division
5705 Commerce Boulevard
Morristown, TN 37814

Re: **Title V Permit for 32-0169**

Dear Mr. Berger:

Please find enclosed your Title V Major Source Operating Permit Number 559215. This permit consists of 24 pages and two attachments. It is important that you read and understand the requirements specified in this permit. While all requirements of your Title V permit are important, the following table summarizes the most important dates associated with your Title V Permit:

Permit **Issue Date**	August 5, 2009
Annual Allowable Based Emission Fees: (see paragraph E1)	**Billing Date**--April 1, 2010 and each subsequent year. **Due Date**--July 1, 2010 and each subsequent year.
TAPCD Semiannual Report: (see paragraph E2)	**Report Period**—September 1, 2009 to March 31, 2010 and each 6-month period thereafter. **Due Date**—May 31, 2010 and each 6-month period thereafter.
TAPCD Annual Compliance Certification: (see paragraph E2)	**Compliance Period**--April 1, 2009 to March 31, 2010 and each subsequent year. **Due Date**--May 31, 2010 and each subsequent year.
Application **Renewal Period**	between October 25, 2013 and January 23, 2014
Permit **Expiration Date**	July 1, 2014

Please note that penalties associated with noncompliance with any of the requirements of this Title V permit are significant. If you violate any of the requirements of this permit, you may be subject to a civil penalty of up to $25,000.00 (TWENTY FIVE THOUSAND DOLLARS) PER DAY FOR EACH DAY OF VIOLATION.

If you have any questions about this permit, please call Sunanda Shajikumar at 615-532-6823.

Sincerely,

John A. Fiemmer

for Barry R. Stephens, P.E.
Technical Secretary
Tennessee Air Pollution Control Board

Enclosure: Title V Permit

cc: Knoxville EFO
Company File
SKS